

DEC 17 2015

WATER QUALITY PROGRAM

Lake Minterwood Beach Club
PO Box 311, Vaughn, WA 98394

December 15, 2015

To: Nathan Lubliner and to all to whom it may concern:
WA State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Reference: Draft NPDES Permit

The Board of Trustees of Lake Minterwood Beach Club INC., (LMBC, PO Box 311, Vaughn, WA 98394) represents all homeowners within Lake Minterwood, a private development, including all lakefront residents and jointly held community property that completely surround Lake Minterwood. The trustees have reviewed your agency's draft NPDES permit and herewith submit our comments and concerns related to this draft permit.

Page 26 -S5E1e Shoreline Posting Requirements

"e. Remove all old signs at the end of the period of water use restriction."

The current filing costs and permitting fees already exceed the actual labor costs to treat the lake. This added requirement will serve no purpose. We have noticed that most of the signage lake-wide is removed by the property owners shortly after treatment. Requiring the contractor to come back to the lake after all of the restrictions have expired to remove the few remaining signs will only add additional costs to our treatment program. All of the water use restrictions are identified on the postings. Once our members are aware of the restrictions, they typically remove them anyway. None have asked us to have the signs removed, and our board of trustees has the enforcement authority to ask our members to remove unsightly signs in a timely manner.

Page 27 S5 C6 Notification

"6. The Permittee must email to Ecology, at apampreposttreat@ecy.wa.gov, a copy of the notice, the date of distribution, **and a list of addresses that the notice was delivered to**, no later than one business day following public distribution. The Permittee must email a copy of the notice, including the date of distribution, to the Department of Natural Resources (DNR at Todd.Brownlee@dnr.wa.gov no later than one business day following public distribution. The Permittee need not notify DNR for treatments occurring on privately-owned lakes with no public access.

Our board of trustees finds this proposed change to be an intrusion of our members' privacy. By demanding the Permittee submit this list to your agency, you are allowing this information to be available to any person or environmental group, locally and nationally, for their own agenda, through the Freedom of Information Act. Other means would appear to be more appropriate for Ecology to determine if such notifications have been made. Perhaps such personal information should only be submitted after a complaint of not receiving such notice has been documented to be true.

Page 39 G2 Right of Entry and Inspection

"Representatives of Ecology must have the right to enter at all reasonable times in or upon any property, public or private, for the purpose of inspecting and investigating conditions relating to the pollution or the possible pollution of any waters of the state."

LMBC regards the lake as the key component of our community properties. We maintain a diligent watch over its maintenance. As the lake itself resides upon, and is entirely surrounded by private property, we are against Ecology entering our community-owned properties and private properties without first contacting us and receiving permission. Ecology already has visual access from a roadway, and we could provide access through our private park on request. Since the treatment activity typically takes place in the water and not on land, we are not in favor of allowing any access without first contacting the Trustees of LMBC for approval.

Sincerely,



Robert S. DeLaney

Secretary

Lake Minterwood Beach Club

FOR THE LAKE MINTERWOOD BEACH CLUB BOARD OF TRUSTEES

LMBCSecretary@comcast.net

253-884-6469